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December 13, 2024

Via ECF

Hon. Gregory H. Woods,
 United States District Judge
 United States Courthouse
 500 Pearl Street
 New York, New York 10007

USDC SDNY
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MEMORANDUM ENDORSED

Re: Lambert, et al v. New Start Capital, et al; Docket No.: 1:24-cv-8055

Dear Judge Woods:

We represent Plaintiffs, on behalf of themselves and a putative class, in the above-docketed employment matter. In compliance with Rule 1(E) of this Court's individual practice rules, Plaintiffs write jointly with counsel for the appearing Defendants New Start Capital LLC and Robert Russini¹ to request a 30-day adjournment of the Initial Pretrial Conference scheduled for December 20, 2024, and the accompanying joint letter, which is due December 13, 2024. (*See*, ECF Docket No. ["Dkt. No."] 11). This is the parties' first request for an adjournment of the Initial Conference and the associated deadlines, detailed below.

An adjournment of the Initial Conference is necessary since Defendants' time to respond to the Complaint was recently extended to December 19, 2024 (Dkt. No. 20) and not all Defendants have retained counsel; thus, the parties have not yet been able to gather the information necessary to complete the joint letter.

Likewise, the parties jointly request a 30-day adjournment of the deadlines set forth in this Court's November 18, 2024 Mediation Referral Order. (Dkt. No. 19). By its terms, the parties are to exchange pre-mediation discovery by December 16, 2024, and schedule mediation by January 17, 2025. (*Id.*). However, exchanging pre-mediation discovery on December 18, 2024, before the answer is due is not practicable, specifically because not all parties have appeared. Accordingly, the parties respectfully request the below adjournments:

	Current Deadline	Proposed Deadline
Initial Pretrial Conference	December 20, 2024	January 20, 2025
Joint Letter in advance of Conference	December 13, 2024	January 13, 2025

¹ Defendants' counsel has advised that they anticipate they will appear on behalf of Defendant Dani Adelstein, but will not be representing Defendant Phil Stein.

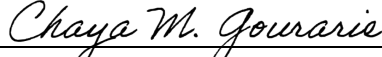
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Date to exchange pre-mediation discovery	December 16, 2024	January 16, 2025
Date to Schedule mediation	January 17, 2025	February 17, 2025

We thank the Court for its kind attention to this matter.

Respectfully,

BELL LAW GROUP, PLLC


 Chaya M. Gourarie, Esq.


Applications granted in part. The parties' request to adjourn the initial pretrial conference, Dkt. No. 21, is granted in part. The initial pretrial conference scheduled for December 20, 2024 is adjourned to January 23, 2025 at 1:00 p.m. The joint status letter and proposed case management plan described in the Court's October 24, 2024 order are due no later than January 16, 2025.

The parties' request to adjourn the deadlines set forth in the Court's November 18, 2024 Mediation Referral Order, Dkt. No. 19, is granted. The deadline for the parties to exchange pre-mediation discovery as described in the Mediation Referral Order is extended to January 16, 2025. The deadline for the parties to schedule a mediation is extended to February 17, 2025.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 21.

SO ORDERED.

Dated: December 13, 2024
 New York, New York


 GREGORY H. WOODS
 United States District Judge